

**COMMONWEALTH OF VIRGINIA  
Department of Environmental Quality  
Valley Regional Office**

**STATEMENT OF LEGAL AND FACTUAL BASIS  
Minor Permit Modification**

Virginia Electric & Power Company aka Dominion  
Dominion – Bremo Power Station  
Facility Location: 1 mile southeast of U.S. Highway 15 on County Route 656,  
Fluvanna County, Virginia  
Permit No. VRO40199

Effective Date: January 1, 2008  
Expiration Date: December 31, 2012

As required by 40 CFR Part 70, 9 VAC 5 Chapter 80, Article 3 and Chapter 140 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution, Virginia Electric & Power Company aka Dominion has applied for a minor permit modification to the Article 3 Operating Permit for its Dominion – Bremo Power Station. The Department has reviewed the application and has prepared a modified draft Article 3 Operating Permit. This permit is based upon Federal Clean Air Act Acid Rain permitting requirements of Title IV, federal operating permit requirements of Title V, and Chapter 80, Article 3 and Chapter 140 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution

Engineer/Permit Contact: \_\_\_\_\_

Date: 6/23/08

Air Permit Manager: \_\_\_\_\_

Date: 6/23/08

Deputy Regional Director: \_\_\_\_\_

Date: 8/18/08

## REQUESTED MODIFICATION

On April 8, 2008, the Valley Regional Office (VRO) received a letter dated April 2, 2008, wherein Virginia Electric & Power Company aka Dominion requested an administrative amendment to its Article 3 Federal Operating Permit for the Bremo Power Station. Dominion requested the following changes to their permit:

- 1) An editorial change to some of the language contained in the Compliance Assurance and Monitoring (CAM) Plan
- 2) The removal of sources associated with the Syn Fuel Plant

Dominion requested that the CAM Plan table for ESP-3 and ESP-4 be modified to make it consistent with Condition III.A.10. Specifically, a change in the “Indicator range” for “Indicator 1” listed in Attachment A was requested as follows:

Existing text-

*Continuous operation between 0% and 20% opacity per hour. An excursion is defined as average opacity greater than 20% during one six-minute period in any one hour.*

Proposed text-

*Continuous operation between 0% and 20% opacity. An excursion is defined as average opacity greater than 20% during one six-minute period in any one hour, with the exception of one six-minute period per hour not to exceed 60% opacity.*

DEQ staff agrees that the wording in the CAM Plan table was inadvertently omitted from the renewal permit. The wording will be changed to the proposed text to correct the omission. DEQ staff requested that Dominion submit a Form 805 to request a minor permit modification for the removal of the Syn Fuel Plant equipment because administrative amendment procedures (9 VAC 5-80-560) cannot be used for this purpose.

On May 16, 2008, the VRO received the Form 805 from Dominion for a minor modification to remove all references to the Syn Fuel Plant which finished production on December 31, 2007. A mutual shutdown determination was processed on June 20, 2008 to revoke the minor NSR permit dated July 29, 2005 for the Syn Fuel Plant. The application for the Article 3 Operating Permit was considered complete when the mutual shutdown determination was finalized. The proposed changes to Dominion’s Article 3 Operating Permit are considered a minor modification to the permit, as defined in 9 VAC 5-80-570.

## APPLICABILITY OF 9 VAC 5-80-570

Minor permit modification procedures can only be used for those permit modifications that:

1. Do not violate any applicable requirement.

*The correction of the wording in the CAM Plan table and the removal of shutdown equipment do not violate any applicable requirements.*

2. Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit such as a change to the method of monitoring to be used, a change to the method of demonstrating compliance or a relaxation of reporting or recordkeeping requirements.

*The correction of the wording in the CAM Plan table and the removal of shutdown equipment do not involve changes to existing monitoring, reporting, or recordkeeping requirements for the remaining equipment in the permit.*

3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis.

*The correction of the wording in the CAM Plan table and the removal of shutdown equipment do not change any of the above referenced determinations for the remaining equipment.*

4. Does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable federal requirement and that the source has assumed to avoid an applicable federal requirement to which the source would otherwise be subject. Such terms and conditions include:
  - a. A federally enforceable emissions cap assumed to avoid classification as a Title I modification; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under §112(i)(5) of the federal Clean Air Act.

*Dominion – Bremo Power Station does not have any of these types of limits in their Article 3 Operating Permit.*

5. Are not Title I modifications.

*The requested modification is not a Title I modification.*

6. Are not required to be processed as a significant modification under 9 VAC 5-80-590 or as an administrative permit amendment under 9 VAC 5-80-560.

*The requested modification does not qualify as an administrative permit amendment or a significant modification.*

The modification can be processed using the minor permit modification procedures as defined in 9 VAC 5-80-570.

## **CHANGES TO ARTICLE 3 OPERATING PERMIT**

The Article 3 Operating Permit for the facility became effective on January 1, 2008 and will expire on December 31, 2012. The following changes have been made to the existing Article 3 Operating Permit:

Facility Information: The facility description was modified to remove the references to the Syn Fuel Plant.

Table of Contents: Section V entitled Process Equipment Requirements (Syn Fuel Plant (ES-6)) was removed from the Table of Contents.

Section V: Section V entitled Process Equipment Requirements (Syn Fuel Plant (ES-6)) was removed in its entirety.

## **PUBLIC PARTICIPATION**

The public participation requirements of 9 VAC 5-80-670 do not apply to minor permit modifications. Therefore, a public notice is not required.

9 VAC 5-80-570 D requires that “affected states” and EPA be notified of the of the minor permit modification request within five days of receipt of a complete application. EPA was notified of the receipt of the application by electronic mail on May 20, 2008. The application was not considered complete until the mutual shutdown determination for the Syn Fuel Plant was completed on June 20, 2008. The proposed permit was sent to EPA on June 26, 2008. EPA’s 45-day review period ended on August 10, 2008. No comments were received.

**COMMONWEALTH OF VIRGINIA**  
**Department of Environmental Quality**  
**Valley Regional Office**

**STATEMENT OF LEGAL AND FACTUAL BASIS**

Virginia Electric & Power Company aka Dominion  
Route 656 Fluvanna County, Virginia  
Permit No. VRO40199

Title IV of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain electrical generation facilities have federal Air Pollution Operating Permits, called Title IV Operating Permits. As required by 40 CFR Part 70, 9 VAC 5 Chapter 80, Article 3 and Chapter 140 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution, Virginia Electric & Power Company has applied for a Title IV Operating Permit for its Bremo Power Station electric generation facility. The Department has reviewed the application and has prepared a draft Federal Operating Permit. This permit is based upon Federal Clean Air Act Acid Rain permitting requirements of Title IV, federal operating permit requirements of Title V, and Chapter 80, Article 3 and Chapter 140 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution.

Engineer/Permit Contact: \_\_\_\_\_ Date: \_\_\_\_\_

Air Permit Manager: \_\_\_\_\_ Date: \_\_\_\_\_

Deputy Regional Director: \_\_\_\_\_ Date: \_\_\_\_\_

## **FACILITY INFORMATION**

### Permittee

Virginia Electric & Power Company aka Dominion  
5000 Dominion Boulevard  
Glen Allen, Virginia 23060

### Facility

Dominion - Bremo Power Station  
1038 Bremo Road  
Bremo Bluff Virginia 23022

Plant ID No. 51-065-0001

## **SOURCE DESCRIPTION**

Facility Description: NAICS Code 221112 (Electric Power Generation)

The Bremo Power Station is a coal-fired electric power generating facility located in Fluvanna County, Virginia. The facility includes two dry bottom wall-fired Babcock and Wilcox boilers rated at 912 and 1,699 million Btu per hour design heat input capacity. Particulate emissions from these boilers are controlled by electrostatic precipitators. The facility also includes a coal handling operation and a synthetic fuel plant.

The facility is a Title V major source of particulate matter less than or equal to ten microns in diameter (PM-10), sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), hydrogen fluoride (HF), hydrochloric acid (HCl) and total HAPs (combined). The source is located in an attainment area for all pollutants and is a PSD major source. The facility is also subject to the NO<sub>x</sub> Budget Trading Program regulations (9 VAC 5 Chapter 140) and the Title IV Acid Rain regulations (9 VAC 5 Chapter 80, Article 3). The facility was issued a Phase II Acid Rain permit on January 1, 2003 and this permit expires on December 31, 2007. The facility is also subject to the Clean Air Interstate Rule (CAIR) Program (40 CFR Part 96) and the requirements will be included with this federal operating permit. The coal-handling portion of the facility was permitted under a minor NSR permit issued on February 26, 2002. The synthetic fuel plant was permitted under a minor NSR permit issued on July 29, 2005. Bremo's initial Federal Operating Permit – Article 3 was issued on April 29, 2004 with an administrative amendment on June 8, 2005 and a significant modification on October 25, 2006 and expires on December 31, 2007.

## **COMPLIANCE STATUS**

The facility is inspected once a year. The facility was last inspected on August 16, 2007 and is currently considered in compliance.

On April 22, 2003, the U.S. Environmental Protection Agency (EPA) and the Department of

Justice announced a settlement with Virginia Electric & Power Company (VEPCO) to resolve Clean Air Act violations at eight of VEPCO's coal-fired power plants including Bremo Power Station. The "Consent Decree" was entered by the United States District Court for the Eastern District Court of Virginia, Civil Action Nos. 03-CV-517-A and 03-CV-603-A, on October 10, 2003 between VEPCO and the United States, et al. The Title IV renewal permit includes requirements of the Consent Decree for Bremo Power Station (Section VI) at least as stringent as the terms of the Consent Decree.

## **CHANGES SINCE INITIAL PERMIT**

On June 8, 2005, an administrative amendment was used to correct an error in the monitoring requirements for the Unit 3 ESP. On October 25, 2006, the permit was modified using the significant modification procedures to include NSR requirements for the Syn Fuel Plant.

Since the significant permit modification to Bremo's Federal Operating Permit, the following changes were made to the draft renewal Federal Operating Permit:

- *Compliance Assurance Monitoring (CAM) Plan:* The two main boilers at Bremo (Units ES-3 and ES-4) are subject to the requirements of 40 CFR Part 64. The CAM boilerplate language was added as Section III.C along with the CAM recordkeeping requirement to Section III.D and the CAM Reporting requirements as Section III.F. The CAM Plan for the electrostatic precipitators (ESP-3 and ESP-4) is included as Attachment A to the permit.
- *Consent Order Requirements:* The Federal Operating Permit includes Consent Order Requirements (Section VI) that is at least as stringent as the requirements from the April 22, 2003 Consent Decree between the United States and VEPCO.
- *Phase II Acid Rain Permit:* The Phase II Acid Rain Permit was incorporated into the permit. Additional language was added concerning the NO<sub>x</sub> Averaging Plan.
- *Clean Air Interstate Rule (CAIR) Requirements:* CAIR requirements were added to Section XII.

These changes are discussed in more detail below.

## EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date**
<b>Fuel Burning Equipment</b>							
ES-1	EP-1	Kewanee Package Boiler, Model #H3s-200-02-250 Distillate oil/propane-fired (1991)	8.693 mmBtu/hr	-	-	-	-
ES-2	EP-2	Solar Combustion Turbine Model T-351N-21 Kerosene/distillate oil-fired (1967)	5.24 mmBtu/hr	-	-	-	-
ES-3	EP-3	Babcock and Wilcox Boiler (Unit 3) Pulverized coal-fired (distillate oil and used oil primarily used for start-up and flame stabilization) (1950)	912 mmBtu/hr (coal) 504 mmBtu/hr (oil)	Western Precipitator Type R	ESP-3	PM PM-10	-
ES-4	EP-4	Babcock and Wilcox Boiler voluntarily retrofitted with low NO <sub>x</sub> burners in 1999 (Unit 4) Pulverized coal-fired (distillate oil and used oil primarily used for start-up and flame stabilization) (1958)	1699 mmBtu/hr (coal) 504 mmBtu/hr (oil)	Western Precipitator Type R	ESP-4	PM PM-10	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date**
<b>Coal Handling System</b>							
ES-5a	ES-5	Coal Handling – Railcar Unloading (1986) NSPS Subpart Y	550 tons/hr	Enclosure	-	PM PM-10	2/26/02
ES-5b	ES-5	Coal Handling – Crushing (1986) NSPS Subpart Y	550 tons/hr	Enclosure	-	PM PM-10	2/26/02
ES-5c	ES-5	Coal Handling – Conveying System (1986) NSPS Subpart Y	550 tons/hr	Enclosure	-	PM PM-10	2/26/02
ES-5d	ES-5	Coal Handling – Storage Piles	-	-	-	PM PM-10	2/26/02
<b>Syn Fuel Plant</b>							
ES-6a		Syn Fuel Plant - One fixed grated grizzly screen (2005) NSPS, Subpart Y	150 tons/hr	Enclosure/Wet Suppression		PM PM-10	7/29/05
ES-6b		Syn Fuel Plant - Four Conveyors (2005) NSPS, Subpart Y	150 tons/hr	Enclosure/Wet Suppression		PM PM-10	7/29/05
ES-6c		Syn Fuel Plant - Two Pug Mixers (2005)	150 tons/hr	Enclosure		PM PM-10	7/29/05
ES-6d		Syn Fuel Plant - Two Briquetters (2005)	150 tons/hr	Enclosure		PM PM-10	7/29/05
ES-6e		Syn Fuel Plant - Radial Stacker (2005)	150 tons/hr	Enclosure/Wet Suppression		PM PM-10	7/29/05
ES-6f		Syn Fuel Plant - Two Raw Binder Tanks (2005)	150 tons/hr				7/29/05

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity <sup>*</sup>	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date <sup>**</sup>
ES-6g		Syn Fuel Plant - Mixing Tank (2005)	150 tons/hr				7/29/05
ES-6h		Syn Fuel Plant - Finished Binder Tank (2005)	150 tons/hr				7/29/05

<sup>\*</sup>The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

<sup>\*\*</sup>Minor New Source Review permit dated 2/26/02 is for the installation and operation of a coal handling system for the power plant. Minor New Source Review permit dated 7/29/05 is for the installation and operation of a syn fuel plant for the power plant.

## EMISSIONS INVENTORY

Annual emissions summarized in the following table are derived in part from the 2006 CEDS emission report and DEQ spreadsheets. A copy of the report and spreadsheets are attached as Attachment A.

<b>2006 Pollutant Emissions (Plantwide Total)</b>	
Pollutant	Tons Emitted
<b>Criteria Pollutants</b>	
PM-10	163.91
VOC	20.36
NO <sub>x</sub>	3392.83
SO <sub>2</sub>	12040.12
CO	157.18
Lead (also a HAP)	0.044
<b>Hazardous Air Pollutants (HAPs)*</b>	
Hydrogen Fluoride	46.92
Hydrochloric Acid	375.38
Arsenic	0.65
Beryllium	0.05
Cadmium	0.08
Chromium Compounds	3.05
Manganese Compounds	2.67
Mercury	0.12
Nickel Compounds	1.85
POM	0.01

\*calculated from DEQ spreadsheets

## EMISSION UNIT APPLICABLE REQUIREMENTS

### **Fuel Burning Equipment Units: ES-1, ES-2, ES-3, and ES-4**

#### *Limitations*

The following applicable limitations are state and federal requirements from the Phase II acid rain permit effective January 1, 2008, which will be incorporated into the Title IV federal operating permit.

SO<sub>2</sub> allowance allocations are as follows:

ES-3 (Unit 3)	2028 tons	for years 2008 and 2009
ES-3 (Unit 3)	1768 tons	for years 2010, 2011, and 2012

ES-4 (Unit 4)	5158 tons	for years 2008 and 2009
ES-4 (Unit 4)	5170 tons	for years 2010, 2011, and 2012

VEPCO submitted a Phase II Acid Rain Permit renewal application dated June 26, 2007 and received June 29, 2007. Attached to the application were the Phase II NO<sub>x</sub> Compliance Plan and the Phase II NO<sub>x</sub> Averaging Plan which included year 2008 through 2012 to coincide with the Acid Rain Permit. On August 17, 2007, DEQ received a letter from VEPCO which instructed us to disregard the Phase II NO<sub>x</sub> Averaging Plan and stated that VEPCO intends to comply with the NO<sub>x</sub> limit of 0.40 lb/mmBtu beginning January 1, 2008, using a new/revised averaging plan. By regulation, VEPCO has until July 1, 2008 to submit the revised averaging plan. Pursuant to 40 CFR 76, a standard NO<sub>x</sub> compliance plan will be used for Units 3 and 4, effective for calendar year 2008 through calendar year 2012. Under the NO<sub>x</sub> compliance plan, the annual average NO<sub>x</sub> emission rate for each year, determined in accordance with 40 CFR Part 75, shall not exceed the applicable emission limitation under 40 CFR 76.7(a)(2), of 0.46 lb/mmBtu of heat input for dry bottom wall-fired boilers not applying cell burner technology.

Since the revised averaging plan may not be submitted until after the permit becomes effective on January 1, 2008, DEQ staff received EPA's approval of the following proposed wording for the NO<sub>x</sub> averaging plan and NO<sub>x</sub> compliance plan section of the permit:

*If the permittee submits an averaging plan in accordance with 40 CFR Part 76 (76.11(b)(1)) and the DEQ approves the plan, then the permittee shall not exceed the annual average NO<sub>x</sub> emission rate specified in the averaging plan for those units specified in the averaging plan. The approved averaging plan emission rate will replace the applicable emission limitation listed in 40 CFR 76.6 or 76.7. If a plan is approved and then later rescinded by the DEQ, then the unit's annual average NO<sub>x</sub> emission rate for each year, determined in accordance with 40 CFR Part 75, shall not exceed the applicable emission limitation under 40 CFR 76.7(a)(2), of 0.46 lb/mmBtu of heat input for dry bottom wall-fired boilers not applying cell burner technology.*

ES-3 (Unit 3) and ES-4 (Unit 4) also meet the definition of a NO<sub>x</sub> Budget Unit and are subject to the NO<sub>x</sub> Budget emission limitations under 9 VAC 5-140-40. Section XI of the Acid Rain Operating Permit includes the NO<sub>x</sub> Budget Trading Program Requirements.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-80-490, Acid Rain Operating Permits – Units ES-3 and ES-4 are subject to the acid rain requirements that specify air pollution control equipment, approved fuels, fuel certification, and operation and maintenance of boilers and control equipment.

9 VAC 5-40-900, Emission Standards for Fuel Burning Equipment – Standard for Particulate Matter – Units ES-2, ES-3, and ES-4 are considered a fuel burning installation

(all fuel burning equipment units within a stationary source in operation prior to October 5, 1979). Allowable emissions for the installation, in pounds of particulate per million BTU input, are calculated using the following formula:

$$\text{Maximum Allowable Emission Ratio (E)} = 1.0906H^{-0.2594}$$

where H is the total capacity in millions of BTU per hour of the installation. Therefore:

$$E = 1.0906 \times (5.24 + 912 + 1699)^{-0.2594} = 0.1416 \text{ lb/mmBTU input}$$

Allowable particulate emissions are the product of the emission ratio E and the total heat input of the installation in mmBTU/hr. Therefore:

$$\text{Maximum Allowable Emissions} = 0.1416 \times 2616.24 = 370.46 \text{ lb/hr}$$

This rule also applies to Unit ES-1. However, because this unit was installed after October 5, 1979, the unit is not part of the fuel burning installation and its allowable particulate emissions are calculated separately. The maximum allowable emission ratio for units with a capacity of less than 10 million BTU/hr is 0.6 pounds of particulate per million BTU input. Therefore:

$$\text{Maximum Allowable Emissions} = 0.6 \times 8.693 = 5.22 \text{ lbs/hr}$$

9 VAC 5-40-910, Emission Allocation System – This rule allows the facility to proportion the allowable particulate emissions among the units in the fuel burning installation (all fuel burning equipment units within a stationary source in operation prior to October 5, 1979). In a letter dated December 9, 2003 (See Attachment B), VEPCO requested a change to their initial particulate allocation because some of the units had been removed or replaced. In a letter dated January 7, 2004, DEQ approved a new particulate allocation for VEPCO's Bremo Power Station. The effective date of the new allocation was January 6, 2004. A copy of the particulate emission allocation is included as Attachment C.

The particulate emissions are allocated as follows:

ES-2	2.00 lbs/hr
ES-3	128.51 lbs/hr
ES-4	239.95 lbs/hr

9 VAC 5-40-930, Emission Standards for Fuel Burning Equipment – Standard for Sulfur

Dioxide – Allowable emissions, in pounds of sulfur dioxide per hour, are calculated using the following formula:

$$\text{Maximum Allowable Emissions (S)} = 2.64K$$

where K is the allowable heat input at total capacity in mmBTU/hr. Therefore:

ES-1	$S = 2.64 \times 8.693 = 22.95 \text{ lbs/hr}$
ES-2	$S = 2.64 \times 5.24 = 13.83 \text{ lbs/hr}$
ES-3	$S = 2.64 \times 912 = 2407.68 \text{ lbs/hr}$
ES-4	$S = 2.64 \times 1699 = 4485.36 \text{ lbs/hr}$

9 VAC 5-50-80, Standard for Visible Emissions – Visible emission limit for new and modified units shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 % opacity applies to ES-1 (installed in 1991).

9 VAC 5-40-80 and 9 VAC 5-40-940, Standard for Visible Emissions – Visible emission limit for existing units shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60% opacity applies to fuel burning units ES-2, ES-3, and ES-4.

The applicable limitations for Units ES-3 and ES-4 from the Consent Decree entered by the United States District Court for the Eastern District of Virginia, Civil Action Nos. 03-CV-517-A and 03-CV-603-A, filed on October 10, 2003 between VEPCO and the United States, et al (the “Consent Decree”) are included in Section VI - Consent Decree Requirements of the Title IV Operating Permit. These requirements will be discussed in Consent Decree Applicable Requirements section of this document.

### *Monitoring*

This permit includes requirements for monitoring to satisfy 40 CFR Parts 70 and 75.

### Units ES-3 and ES-4

9 VAC 5-40-1000 and 40 CFR 75.10 require units ES-3 and ES-4 to install, operate, calibrate and maintain continuous monitors for the purpose of monitoring opacity, sulfur dioxide emissions, and nitrogen oxide emissions.

The permit requires electrostatic precipitators (ESPs) for control of particulate emissions from the boiler units ES-3 and ES-4. Properly operating ESPs should be able to comply with the

opacity limit (20%) and the particulate limits of 128.51 lbs/hr for unit ES-3 and 239.95 lbs/hr for unit ES-4.

Initial particulate testing was performed on Units ES-3 and ES-4 to verify compliance with the particulate limits. Initial testing was required by December 31, 2004 and was completed on November 3, 2004 for Unit ES-4 and December 7, 2004 for Unit ES-3. Subsequent testing was based on the results of the initial tests. Since the initial test results were less than 50% of the emission limit, then no additional tests were required for the term of the permit. The testing frequency will remain unchanged in the renewal permit. Therefore, particulate testing will be required at least once per permit term. If the test results are less than 50% of the emission limit, then no additional tests are required for the term of the permit. For results between 50 and 80 percent of the allowable limit, testing is required every 30 months. For results greater than 80 percent of the allowable limit, testing is required annually. Performance tests for particulate matter conducted under the Consent Decree shall satisfy these testing requirements as long as the tests are performed with a frequency of at least once per permit term.

Monitoring is required for the two ESP units to ensure the control devices are operating properly. ESP-3 is required to have a device to continuously measure the primary voltage and the primary current. The relative spark rate is to be determined by visual observation of the primary voltage and current analogue meter output. ESP-4 is required to have a device to continuously measure the primary and secondary voltage, the primary and secondary current, and the spark rate for each field. The operating condition of each field is to be observed at least once per 12-hour shift. Proper operation of the ESP units will ensure continued compliance with the particulate limits and the opacity standards.

Additionally, daily review of the recorded opacity data is required. Boiler and ESP operating parameters are to be checked if opacity approaches the applicable standard. If boilers or ESPs are not operating within normal parameters, adjustments shall be made to return the unit(s) to proper operation. Opacity data shall be reviewed again to confirm proper operations.

Units ES-3 and ES-4 should be able to comply with the sulfur dioxide (SO<sub>2</sub>) limits. Emissions were estimated using the most current AP-42 emission factors, a coal Btu value of 11,000 Btu/lb, and a sulfur content of 1%. The SO<sub>2</sub> emission estimate for unit ES-3 is 1577.0 lbs/hr. For unit ES-4, the SO<sub>2</sub> emission estimate is 2934.74 lbs/hr. These values are well below the respective emission limits of 2407.68 lbs/hr for unit ES-3 and 4485.36 lbs/hr for unit ES-4.

To verify compliance with the hourly PM emission limits for units ES-3 and ES-4, the permittee is required to calculate daily emissions on a monthly basis. Until PM testing has been completed, AP-42 or other approved emission factors were used to calculate the emissions. Once particulate testing is completed, emission factors derived from the stack tests should be used for the particulate emission calculations. CEM data will be used to verify hourly SO<sub>2</sub> emissions.

Units ES-1 and ES-2

Actual emissions from the operation of units ES-1 and ES-2 will be calculated using the following equation:

$$E = F \times O$$

Where:

E = Emission rate (lb/time period)  
 F = Pollutant specific emission factors as follows:

ES-1

	<u>LPG</u>	<u>distillate oil</u>
PM/PM-10	0.6 lb/1000 gal	3.3 lb/1000 gal
SO <sub>2</sub>	1.5 lb/1000 gal	71 lb/1000 gal

ES-2

PM/PM-10	0.31 lb/mmBTU
SO <sub>2</sub>	0.29 lb/mmBTU

O = Rated capacity of the unit (1000 gal/hr or mmBTU/hr)

Calculations have been included in Attachment D to demonstrate that the emission limits can be met for ES-1 and ES-2. Monthly inspections of units ES-1 and ES-2 are required when burning distillate oil. If during the inspection, visible emissions are observed, an EPA, Method 9 visible emission evaluation is required.

*Compliance Assurance Monitoring (CAM) Plan*

The two main boilers at the Bremono Power Station (ES-3 and ES-4) are subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). These are the only two pollutant-specific emissions units at Bremono that meet all three criteria for applicability under the CAM program. The criteria are:

- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant;
- (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

Each unit (ES-3 and ES-4) is subject to CAM for emissions of particulate matter (PM). VEPCO submitted a CAM Plan for the ESPs on Units ES-3 and ES-4 with their initial renewal application and a revised CAM plan dated September 6, 2007. The proposed CAM Plan includes the following compliance indicators:

1. Opacity monitored by the Continuous Opacity Monitoring System (COMS);
2. Transformer rectifier observation; and
3. Precipitator rapper observation.

Opacity measured by the COMS was selected as the first indicator because failure of the ESPs to control PM emissions will be obvious in terms of opacity. The COMS are required by Condition III.B.1 and are installed, calibrated, maintained and operated in accordance with 9 VAC 5-40-40 and 9 VAC 5-40-41. Opacity is measured continuously by the COMS and opacity data are collected and retained by a computerized Data Acquisition and Handling System (DAHS).

Daily observation of each available (currently in service) rectifier or rectifier alarm was selected as the second indicator. Each ESP has its own transformer rectifiers. Observation of the available rectifiers verifies that adequate electrical power is supplied to the ESPs and that power levels are maintained consistent with manufacturer's specifications, operational design of the equipment and good engineering practices. Any failure of the ESP equipment is recorded in an event log. The log also includes a history of the actions taken to correct the problem and restore the equipment back to operation.

Daily observation of each available (currently in service) rapper or its controls was selected as the third indicator. Each ESP has its own precipitator rappers. Observation of the available rappers verifies that they are energized and that scheduled cleaning is performed on the ESPs. Any failure of the ESP equipment is recorded in an event log. The log also includes a history of the actions taken to correct the problem and restore the equipment back to operation.

The opacity monitoring, transformer rectifier observations, and precipitator rapper observations included in the permit's CAM Plan for ESPs (ESP-3 and ESP-4) will provide assurance of compliance with the particulate emission standards for the boilers (ES-3 and ES-4) and therefore satisfy the requirements of 40 CFR 64.

The permit establishes thresholds (exceedances or excursions exceeding 5 percent duration of the operating time for the boilers (ES-3 and ES-4) for a semiannual reporting period) after which VEPCO is required to develop a CAM Quality Improvement Plan (QIP) according to 40 CFR 64.8.

The CAM boilerplate language was added as Section III.C along with the CAM recordkeeping requirement in Section III.D and the CAM Reporting requirements in Section III.F. The CAM Plan for the electrostatic precipitators (ESP-3 and ESP-4) is included as Attachment A to the permit.

### *Recordkeeping*

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include the annual fuel throughputs of coal and distillate oil, fuel supplier certifications, DEQ-approved emission factors and equations to demonstrate compliance with emission limits for ES-1 and ES-2, daily emissions calculated monthly for PM for units ES-3 and ES-4, hours of operation and visible emissions observation (VEO) results for units ES-1 and ES-2, COM and CEM records, ESP monitoring records, operator training and maintenance records, and performance tests and VEEs.

### *Testing*

Particulate testing for units ES-3 and ES-4 was required by December 31, 2004 to demonstrate compliance with the particulate emission limits contained in the permit. Initial testing was completed on November 3, 2004 for Unit ES-4 and December 7, 2004 for Unit ES-3. Subsequent testing was based on the results of the initial tests. Since the initial test results were less than 50% of the emission limit, then no additional tests were required for the term of the permit. The testing frequency will remain unchanged in the renewal permit. Therefore, particulate testing will be required at least once per permit term. If the test results are less than 50% of the emission limit, then no additional tests are required for the term of the permit. For results between 50 and 80 percent of the allowable limit, testing is required every 30 months. For results greater than 80 percent of the allowable limit, testing is required annually. Performance tests for particulate matter conducted under the Consent Decree shall satisfy these testing requirements as long as they are performed with a frequency of at least once per permit term. A table of test methods has been included in the permit if additional testing beyond what is currently specified is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

## **EMISSION UNIT APPLICABLE REQUIREMENTS**

### **Coal Handling System: ES-5**

#### *Limitations*

The following limitations are state BACT requirements from the minor NSR permit issued on February 26, 2002. Please note that the condition numbers are from the 2002 permit; a copy of the permit is enclosed as Attachment E.

- |              |   |
|--------------|---|
| Condition 3: | Requires railcar unloading (ES-5a) to be controlled by partial enclosure.       |
| Condition 4: | Requires crushing and conveying (ES-5b & ES-5c) to be controlled by enclosures. |

- Condition 5: Fugitive dust control requirements
- Condition 6: Coal throughput limit
- Condition 8: Visible emission limit
- Condition 7: Particulate emission limits for inventory purposes
- Condition 17: Requires maintenance schedule, inventory of spare parts, operating procedures, and operator training

### *Monitoring and Recordkeeping*

Per 40 CFR Part 64, Compliance Assurance Monitoring (CAM) applies to a pollutant-specific emissions unit at a major source that is required to obtain a Part 70 or 71 permit if the unit satisfies all of the following criteria:

- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant;
- (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

VEPCO does not use a control device on any part of the coal handling system to achieve compliance with the particulate emission limit. Enclosures are used on the coal handling system but they are not considered control devices per 40 CFR 64.1. Therefore, the coal handling system does not meet the criteria for CAM applicability.

The permit includes requirements for monitoring and recordkeeping necessary to demonstrate compliance with the permit.

The permittee is required to perform a weekly inspection of the fugitive dust control system for the coal handling operation, perform a daily visual survey of the coal handling activities for sources of visible emissions, and to perform a VEE if visible emissions are observed. As long as the facility maintains the enclosures required by the permit, the particulate emission limits should be met. Required records include, annual coal processed, daily logs of the visual survey, visible emissions evaluations, and maintenance and operator training.

### *Testing*

The permit requires EPA Method 9 testing when visible emissions are observed from the coal

handling equipment. A table of test methods has been included in the permit if additional testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

### *Reporting*

No specific reporting has been included in the permit for the coal handling processes.

### *Streamlined Requirements*

The following conditions in the NSR permit have not been included for the reasons provided:

Condition 9 requiring the coal handling equipment to be operated in compliance with requirements under 40 CFR 60, Subpart Y, except as specified in the minor NSR permit, has not been included. The required 40 CFR 60, Subpart Y requirements have been included in the operating permit.

Conditions 10 and 13 requiring an initial VEE and initial notifications have not been included because these conditions have already been completed.

The particulate emission limits contained in the permit are more stringent than the Virginia Administrative Code Standard for particulate matter in 9 VAC 5-40-260. Therefore, only the more stringent particulate emission limits were included in the permit.

The visible emission limits and fugitive dust requirements contained in the permit are more stringent than the Virginia Administrative Code Standard for visible emission in 9 VAC 5-40-1990 and for fugitive dust/emissions in 9 VAC 5-40-2000. Therefore, only the more stringent limits were included in the permit.

## **EMISSION UNIT APPLICABLE REQUIREMENTS**

### **Syn Fuel Plant: ES-6**

#### *Limitations*

The following limitations are requirements from the minor NSR permit issued on July 29, 2005. Please note that the condition numbers are from the 2005 permit; a copy of the permit is enclosed as Attachment F.

Condition 3: Particulate emissions control requirements for the Syn Fuel Plant

Condition 4: Fugitive dust control requirements

Condition 5: Coal processing throughput limit for the Syn Fuel Plant

Condition 6: Emissions limits for PM, PM-10, and VOC for the operation of the Syn Fuel Plant

Condition 7: Visible emissions limit from the Syn Fuel Plant of 20% opacity

Condition 8: 40 CFR Part 60, Subpart Y requirements for the Syn Fuel Plant NSPS equipment (ES-6a and ES-6b)

### *Monitoring and Recordkeeping*

Per 40 CFR Part 64, Compliance Assurance Monitoring (CAM) applies to a pollutant-specific emissions unit at a major source that is required to obtain a Part 70 or 71 permit if the unit satisfies all of the following criteria:

- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant;
- (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

VEPCO's potential pre-control device emissions for PM and VOC from the syn fuel plant are both less than the Title V major source threshold of 100 tons per year. Therefore, the syn fuel plant does not meet the criteria for CAM applicability.

The permit includes requirements for monitoring and recordkeeping necessary to demonstrate compliance with the permit.

The permittee is required to perform a weekly inspection of the fugitive dust control system for the Syn Fuel Plant, perform a daily visual survey of the Syn Fuel Plant for sources of visible emissions, and to perform a VEE if visible emissions are observed. As long as the facility maintains the enclosures required by the permit, the particulate emission limits should be met. Required records include, annual coal processed through the Syn Fuel Plant, annual amount of latex binding sprayed, MSDSs for each latex binding agent, monthly and annual cumulative emissions of VOC and each HAP for the Syn Fuel Plant, visible emissions evaluations, scheduled and unscheduled maintenance, daily logs of the visual surveys, and weekly logs of fugitive dust emissions control system inspections.

### *Testing*

An initial VEE is required for the Syn Fuel Plant. The permit also requires EPA Method 9

testing when visible emissions are observed from the Syn Fuel Plant. A table of test methods has been included in the permit if additional testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

### *Reporting*

No specific reporting has been included in the permit for the Syn Fuel Plant.

### *Streamlined Requirements*

The following conditions in the NSR permit have not been included for the reasons provided:

Condition 12 requiring initial notifications has not been included because this condition has already been completed.

The particulate emission limits contained in the permit are more stringent than the Virginia Administrative Code Standard for particulate matter in 9 VAC 5-40-260. Therefore, only the more stringent particulate emission limits were included in the permit.

The visible emission limits and fugitive dust requirements contained in the permit are more stringent than the Virginia Administrative Code Standard for visible emission in 9 VAC 5-40-1990 and for fugitive dust/emissions in 9 VAC 5-40-2000. Therefore, only the more stringent limits were included in the permit.

## **CONSENT DECREE REQUIREMENTS**

### **Units: ES-3 and ES-4**

Based on recent discussions with EPA Region III, Title IV and Title V permits for the eight plants incorporated in the VEPCO 2003 Consent Decree (including Bremo Power Station) should include applicable requirements for any air pollution controls that are installed or will be installed during the five year renewal term. VEPCO submitted applicable requirements related to the Consent Decree as follows:

### *Limitations*

Per Paragraph 78 of the Consent Decree, the permittee shall operate each electrostatic precipitator (ESP-3 and ESP-4) on boilers (ES-3 and ES-4) to maximize particulate matter (PM) emission reductions through the procedures listed in the Consent Decree. No later than April 21, 2009, the permittee shall complete an ESP optimization study for each boiler (ES-3 and ES-4) per the requirements in Paragraph 79 of the Consent Decree.

Within 270 days after the permittee receives the approval of each ESP optimization study, the permittee may elect to achieve the objectives of, and thereby avoid, the Pollution Control Upgrade Analysis by operating and maintaining the ESPs (ESP-3 and ESP-4) in compliance with the approved respective ESP optimization plan and the permittee shall meet a PM emission limit of 0.030 lb/mmBtu at the stack for the boilers (ES-3 and ES-4) except during periods of startup and shutdown (as defined in Paragraph 81 of the Consent Decree), or during periods of control equipment or boiler (ES-3 and ES-4) malfunction, if the malfunction meets the requirements of the Force Majeure Section of the Consent Decree (Section XXVI).

Periods of startup shall not exceed two hours after cessation of injection of oil into the boilers (ES-3 and ES-4). Periods of shutdown shall only commence when any oil is introduced into the boilers (ES-3 and ES-4).

### *Monitoring and Recordkeeping*

Per Paragraph 78 of the Consent Decree, VEPCO must conduct inspections of the operation of the ESP rectifiers and rappers once per shift to determine if the rectifiers and rappers are functioning within manufacturers' specifications, the operational design of the unit, and good engineering practices or not functioning. The results of the inspections shall be recorded in a log. If VEPCO determines that the ESP rectifiers and rappers are not functioning or are functioning outside of manufacturers' specifications and good engineering practices, VEPCO shall use best efforts to repair the element no later than the next available Unit outage appropriate to the repair task.

Paragraph 78 also requires that the permittee maintain records of all emission data and operating parameters necessary to demonstrate compliance with the permit. These records include:

- Log of all daily inspections and ESP event and malfunction information, including reasons and corrective actions.
- Startup and shutdown events for Units ES-3 and ES-4.
- Results of all EPA Reference Method tests.

### *Testing*

Per Paragraph 95 of the Consent Decree, stack tests are required for particulate matter on Units ES-3 and ES-4 to demonstrate compliance with the particulate emission limits contained in Conditions III.A.7 and III.A.8. The tests must be conducted at least once per every four successive "QA Operating Quarters". A "QA Operating Quarter" means a calendar quarter in which there are at least 168 unit operating hours or, for a common stack or bypass stack, a calendar quarter in which there are at least 168 stack operating hours. A stack operating hour

means a clock hour during which flue gases flow through a particular stack or duct (either for the entire hour or for part of the hour) while the associated units (ES-3 and ES-4) are combusting fuel. Test results are to be submitted as part of the periodic reporting requirements.

When the 0.030 lb/mmBtu particulate emission limit becomes applicable, Paragraph 80 requires VEPCO to conduct stack tests for particulate matter on Units ES-3 and ES-4 to demonstrate compliance with that limit. Again, the tests must be conducted at least once per every four successive "QA Operating Quarters". Testing shall coincide with the testing required in Condition VI.D.1. Test results shall be submitted as part of the periodic reporting requirements.

### *Reporting*

VEPCO shall submit Consent Decree periodic reports as required under Appendix B of the Consent Decree.

## **GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 72 and 9 VAC 5-80-490, that apply to all acid rain operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within one business day.

## **TITLE IV (PHASE II ACID RAIN) PERMIT ALLOWANCES AND REQUIREMENTS**

The Phase II permit was incorporated into the permit including the SO<sub>2</sub> allowance allocations and the NO<sub>x</sub> requirements.

## **NO<sub>x</sub> BUDGET TRADING PROGRAM REQUIREMENTS**

The Bremo Power Station is subject to the NO<sub>x</sub> Allowance Budget Trading Program (9 VAC 5-140-10) regulations and the facility submitted a permit application to EPA and DEQ dated October 30, 2002. These regulations affect units ES-3 and ES-4 and were incorporated into the initial acid rain operating permit. In 2009, NO<sub>x</sub> Budget Trading Program (NBP) states affected by the Clean Air Interstate Rule (CAIR) will transition to the CAIR annual and/or ozone season programs.

## **CLEAN AIR INTERSTATE RULE (CAIR) PERMIT**

On March 10, 2005, the EPA signed the Clean Air Interstate Rule. The final rule was subsequently published in the Federal Register on May 12, 2005. The rule will require 28 eastern states (including Virginia) and the District of Columbia to achieve specified emission reductions for new and existing electric generating units (EGUs). Virginia DEQ opted to meet the state's emission budget by requiring EGUs to participate in an interstate cap-and-trade system, administered by the EPA that caps emissions in two stages. Phase I emission reductions

begins in the 2009 for the NO<sub>x</sub> ozone season and annual programs and 2010 for SO<sub>2</sub> annual program. The facility submitted a CAIR permit application to DEQ dated June 21, 2007 with a revised application dated August 29, 2007. These regulations affect units ES-3 and ES-4 and are incorporated by reference into this renewal Title IV Operating Permit. Dominion's CAIR application is included as an attachment to the Article 3 permit. Phase II begins in the year 2015 for all programs for both pollutants.

In 2009, NO<sub>x</sub> Budget Trading Program (NBP) states affected by the Clean Air Interstate Rule will transition to the CAIR annual and/or ozone season programs.

### **STATE ONLY APPLICABLE REQUIREMENTS**

None identified by the applicant.

### **FUTURE APPLICABLE REQUIREMENTS**

On July 30, 2007, the U.S. Court of Appeals for the D.C. Circuit Court (Court) vacated the Industrial, Commercial and Institutional Boilers and Process Heaters Maximum Achievable Control Technology regulation (Boiler MACT) contained in 40 CFR 63, Subpart DDDDD. The mandate also vacated the Commercial/Industrial Solid Waste Incinerators Definitions Rule (CISWI) contained in 40 CFR 60, Subparts CCCC and DDDD. The court vacated and remanded to the EPA both the Boiler MACT and the CISWI Definitions Rule. The Court rejected EPA's definition of "commercial or industrial waste," as incorporated in the definition of the CISWI unit. The Court concluded that the EPA's definition was too restrictive and exempted certain emission units that should be defined as boilers. Because an emissions unit can be regulated either by the CISWI rules or the Boiler MACT, but not both, the Court decision will potentially shift at least some of the units that are currently regulated under the Boiler MACT into the CISWI category. As a result of the Court decision, EPA needs to recalculate the stringency of the emissions standards for the newly expanded CISWI category and the narrowed boiler category. Sources that were subject to the vacated Boiler MACT may now be subject to case-by-case MACT under Clean Air Act Section 112 (g) or 112 (j). DEQ is in the process of determining if case-by-case MACT was triggered when the Court vacated the Boiler MACT. A case-by-case MACT determination may be required for Bremo's fire tube boiler (ES-1).

### **INAPPLICABLE REQUIREMENTS**

40 CFR 60, Subpart D, 40 CFR 60, Subpart Da, and 40 CFR 60, Subpart Db have been specifically identified as being not applicable to units ES-3 and ES-4 as construction of the boilers took place prior to the applicability dates of these standards of performance (August 17, 1971, September 18, 1978, and June 19, 1984, respectively.) 40 CFR 60, Subpart Dc was identified as not being applicable for Unit ES-1 as this unit is less than 10 million BTU/hr heat input and 40 CFR 60, Subpart GG was identified as not being applicable to Unit ES-2 because the unit is less than 10 million BTU/hr heat input.

## INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-490.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
IS-1	Lube Oil Systems/Waste Oil Systems/Hydraulic Oil Systems	9 VAC 5-80-720B	VOC	
IS-2	215,000 Gallon #2 Fuel Oil Tank	9 VAC 5-80-720B	VOC	
IS-3	275 Gallon Gasoline Dispensing Station & Tank	9 VAC 5-80-720B	VOC	
IS-4	500 Gallon Kerosene Tank	9 VAC 5-80-720B	VOC	
IS-5	Antifreeze Usage on Coal Conveyors	9 VAC 5-80-720B	VOC	
IS-6	Wendon (bridging agent) Usage on Coal	9 VAC 5-80-720B	VOC	
IS-7	Flyash Handling System	9 VAC 5-80-720B	PM-10	
IS-8	Gravel Roads	9 VAC 5-80-720B	PM-10	
IS-9	Sand Blasters (1)	9 VAC 5-80-720B	PM-10	
IS-10	Sewage Treatment	9 VAC 5-80-720B	VOC	
IS-11	Coal Sampling Systems (as received & as fired)	9 VAC 5-80-720B	PM-10	
IS-12	Ash Storage Ponds	9 VAC 5-80-720B	PM-10	
IS-13	Diesel Fire Pump	9 VAC 5-80-720C		150 HP
IS-14	Lime Slurry Tank	9 VAC 5-80-720B	PM-10	
IS-15	275 Gallon Fire Pump Diesel Tank	9 VAC-5-80-720B	VOC	
IS-16	10,000 Gallon Coal Yard Diesel Tank	9 VAC-5-80-720B	VOC	

<sup>1</sup>The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

## CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the permit application

are suitable for public review.

## **OTHER CONSIDERATIONS**

On June 15, 2005, J. David Rives was made the Designated Representative (USEPA Acid Rain Program) and the Account Authorized Representative (USEPA NO<sub>x</sub> Budget Program) for the Bremo Power Station. This administrative change was incorporated during the significant modification to the Title IV Operating Permit on October 25, 2006. On June 4, 2007, J. David Rives and Harry L. Miller were made the primary and alternate Designated Representatives, respectively (USEPA CAIR Program) for the Bremo Power Station. This was incorporated into the renewal Title IV Operating Permit.

## **PUBLIC PARTICIPATION**

A public notice was published in the Charlottesville Daily Progress on November 16, 2007 announcing a 30-day public comment period for this permit. The public comment period ended on December 16, 2007, and EPA's comment period was scheduled to end on December 31, 2007 (concurrent review of the permit as both draft and proposed). However, EPA sent an email on December 20, 2007 stating that DEQ should proceed with issuance of the Dominion – Bremo permit. There were no comments received.